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Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA
MUNIZ, ELIZA CAMBAY, SAL
CATALDO, EMIR GOENAGA, JULIAN
SANTIAGO, HAROLD NYANJOM,
KELLIE NYANJOM, and SUSAN LYNN
HARVEY, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

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Attorneys for Defendant Google LLC

Case No. 3:20-CV-04688-RS

**JOINT STIPULATION AND [PROPOSED]
ORDER SETTING CLASS
CERTIFICATON BRIEFING SCHEDULE
AND HEARING DATE**

Judge: The Honorable Richard Seeborg

1 Pursuant to Civil Local Rules 6-2 AND 7-12, this joint stipulation is entered into between
2 Plaintiffs and Google LLC (“Google”), collectively referred to as the “Parties.”

3 WHEREAS, on November 22, 2021, the Court granted Plaintiffs’ Motion for Relief from
4 Case Management Schedule, extending the deadlines for the close of fact discovery, initial expert
5 witness disclosures, rebuttal expert witness disclosures, and the close of expert discovery (Dkt. 180).

6 WHEREAS, the close of fact discovery is now July 13, 2022, and the close of expert
7 discovery is now December 16, 2022 (Dkt. 180).

8 WHEREAS, the hearing on Plaintiffs’ motion for class certification was previously set for
9 June 2, 2022 (Dkt. 59).

10 WHEREAS, the parties have agreed to a new class certification hearing date that follows the
11 December 16, 2022 close of expert discovery.

12 WHEREAS, the parties have agreed to a briefing schedule for Plaintiffs’ motion for class
13 certification.

14 NOW THEREFORE, the Parties stipulate:

- 15 1. The deadline for Plaintiffs to file their motion for class certification shall be January 26,
16 2023.
- 17 2. The deadline for Google to file any opposition shall be March 2, 2023.
- 18 3. The deadline for Plaintiffs to file any reply shall be March 30, 2023.
- 19 4. The hearing on Plaintiffs’ motion for class certification shall be April 13, 2023, or as
20 soon thereafter as the Court is available.

21
22 DATED: February 1, 2022

SUSMAN GODFREY LLP

23
24 By: Amanda Bonn

Amanda Bonn

25 Counsel on behalf of Plaintiffs

1 DATED: February 1, 2022

WILLKIE FARR & GALLAGHER, LLP

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3 By: Eduardo E. Santacana

4 Eduardo E. Santacana

5 *Counsel on behalf of Google*
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ATTESTATION OF CONCURRENCE

I am the ECF user whose ID and password are being used to file this Joint Stipulation and [Proposed] Order. Pursuant to Civil L.R. 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in the filing of this document

Dated: February 1, 2022

By Amanda Bonn

Amanda Bonn

Counsel on behalf of Plaintiffs

[PROPOSED] ORDER

Pursuant to stipulation of the Parties, the Court hereby sets the following briefing schedule and hearing date for Plaintiffs' motion for class certification.

Action	Scheduling Order (Dkt. 180)	New Date
Close of Fact Discovery	July 13, 2022	No change
Initial Expert Witness Disclosures	July 13, 2022	No change
Rebuttal Expert Witness Disclosures	October 28, 2022	No change
Close of Expert Discovery	December 16, 2022	No change
Plaintiffs' motion for class certification:	N/A	January 26, 2023
Google's opposition:		March 2, 2023
Plaintiffs' reply:		March 30, 2023
Hearing on Motion for Class Certification	TBD	April 13, 2023 [or as soon thereafter as the Court is available]

IT IS SO ORDERED.

DATED: _____, 2022

Hon. Richard Seeborg
Chief United States District Judge